

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. MORGAN REYNOLDS on behalf of the UNITED
STATES OF AMERICA,
Plaintiff/Relator,
v.
SCIENCE APPLICATIONS INTERNATIONAL
CORP.; APPLIED RESEARCH ASSOCIATES INC.;
BOEING; NuSTATS; COMPUTER AIDED
ENGINEERING ASSOCIATES, INC.;
DATASOURCE, INC.; GEOSTAATS, INC.;
GILSANZ MURRAY STEFICEK LLP; HUGHES
ASSOCIATES, INC.; AJMAL ABBASI; EDUARDO
KAUSEL; DAVID PARKS; DAVIS SHARP;
DANIELE VENEZANO; JOSEF VAN DYCK;
KASPAR WILLIAM; ROLF JENSEN &
ASSOCIATES, INC.; ROSENWASSER/GROSSMAN
CONSULTING ENGINEERS, P.C.; SIMPSON
GUMPERTZ & HEGER, INC.; S.K. GHOSH
ASSOCIATES, INC.; SKIDMORE, OWINGS &
MERRILL, LLP; TENG & ASSOCIATES, INC.;
UNDERWRITERS LABORATORIES, INC.; WISS,
JANNEY, ELSTNER ASSOCIATES, INC.;
AMERICAN AIRLINES; SILVERSTEIN
PROPERTIES; and UNITED AIRLINES,
Defendants.

Case No. 07CV4612 (GBD)

**NOTICE OF MOTION
TO DISMISS**

PLEASE TAKE NOTICE that, upon the attached affidavit of DAVID M. POLLACK, attorney for the Defendants, Simpson Gumpertz & Heger, Inc. ("SGH") and Computer Aided Engineering Associates, Inc. ("CAE"), and the Memorandum of Law In Support Of Motion To Dismiss Pursuant To Fed. R. Civ. P. 9(b), 12(b)(1), 12(b)(6) and 12(h)(3), Defendants shall move this Court, before the Honorable George B. Daniels, U.S.D.J., on a date and time to be determined by the Court, for an order dismissing the *qui tam* Complaint filed by Dr. Morgan Reynolds ("Reynolds") in its entirety, and with prejudice, and for an award of attorney's fees and costs pursuant to 31 U.S.C. § 3730(d)(4).

Dated: New York, New York
October 5, 2007

/s/ David M. Pollack

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